

Federal Defenders OF NEW YORK, INC.

Southern District
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Southern District of New York
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May 11, 2022

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street,
New York, NY 10007

Re: United States v. Baudilio Reyes
20 Cr. 507 (PAC)

Dear Judge Crotty:

I write on behalf of my client Baudilio Reyes to respectfully request that the Court temporarily modify the conditions of the bond so that Mr. Reyes can travel to Washington DC, to attend a family wedding (Ex. A, wedding invitation). Mr. Reyes's partner's sister is getting married on May 21, 2022, and he would like to attend the ceremony. He will leave Philadelphia on May 21st, and return on May 22nd. Although pre-trial services (PTS) objects to this modification, it is because of an office wide policy where they always object to overnight travel for individuals on location monitoring. Mr. Reyes' PTS officer, Josh Rothman, specifically indicated that Mr. Reyes is in full compliance. The Government defers to PTS. The Government also understands that PTS does not consent because of policy and that Mr. Reyes has otherwise been in full compliance.

On July 30th, 2020, Magistrate Judge Sarah L. Cave imposed the following bail conditions: \$50,000 PRB; 2 FRP'S; Travel Limited to SDNY/EDNY & ED PA (& Points in Between for Court); Surrender Travel Documents (& No New Applications); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft to Continue or Seek Employment; Deft Not to Possess Firearm/Destructive Device/Other Weapon; Deft to Be Released on Own Signature; Remaining Conditions to Be Met by 9/1/2020.

Mr. Reyes has been fully compliant with the conditions of his bail, and constantly communicates with his PTS officer in the Eastern District of Pennsylvania, Charles Meissler. If approved, Mr. Reyes will share his travel itinerary with Mr. Meissler, and keep in constant contact with him throughout the duration of his trip.

Respectfully submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
Tel.: 917-612-2753

SO ORDERED:

5-18-22 Paul A. Crotty
HONORABLE PAUL A. CROTTY
United States District Judge

cc: AUSA Kaylan Lasky
AUSA Brandon Harper
PTS Officer Josh Rothman